

FLEISCHMAN AND WALSH, L.L.P.

ATTORNEYS AT LAW

A PARTNERSHIP INCLUDING A PROFESSIONAL CORPORATION

1919 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

Tel: (202) 939-7900

Fax: (202) 745-0916

INTERNET WWW.FW-LAW.COM

LAWRENCE R. FREEDMAN

(202) 939-7923

LFREEDMAN@FW-LAW.COM

Via Electronic Mail

Mr. Christopher Libertelli

Chief Legal Advisor, Chairman Powell

Federal Communications Commission

445 12th Street, S.W.

Washington, D.C. 20554

Re: Unbundled Access to Network Elements, WC Docket No. 04-313;
Review of Section 251 Unbundling Obligations of Incumbent Local
Exchange Carriers; CC Docket No. 01-338

Dear Mr. Libertelli:

On December 7, 2004, representatives of WorldNet Telecommunications, Inc. ("WorldNet") met with you regarding the implications of the above referenced docket on competitors and competition in Puerto Rico. During this meeting we discussed, among other things, the standards that the Commission could apply on a national basis to identify those areas where competitors are not impaired without access to interoffice transport.

During our discussion you suggested that one possibility available to the Commission could be to infer non-impairment in those wire centers with more than 40,000 business lines and we discussed how such a rule would affect the market in Puerto Rico. In relation to this, you asked whether WorldNet knew how many wire centers in Puerto Rico had more than 40,000 business lines. While WorldNet did not have this information during our meeting, we have now determined that Puerto Rico Telephone Company ("PRTC") has nineteen (19) wire centers rated as "Tariff Scale 1," which PRTC defines as including local exchange service areas with over 40,000 main working lines in service. A list of PRTC wire centers and the relevant page from PRTC's local tariff are attached. This is out of a total of eighty-seven wire centers in Puerto Rico. These wire centers are located in Puerto Rico's major urban centers. It must be noted that the number of wire centers that have more than 40,000 *business* lines is not clear from current records. It is likely that this number would be substantially smaller than nineteen.

While it may be reasonable in markets on the mainland to infer that competitors are not impaired without access to transport serving any wire centers with a business line density of

40,000 lines, WorldNet believes that it would be inappropriate to use this as the sole factor for determining whether transport should be made available in Puerto Rico. Doing so would have the effect of leaving competitors without any option other than to use PRTC tariffed services in many high-density wire centers.

This is because there are simply no competitive alternatives available in most of the high-density wire centers in Puerto Rico. Centennial is currently the only competitive carrier in Puerto Rico that has any interoffice transport and they currently only have facilities in eight (8) PRTC wire-centers. With regard to self-provisioning, there are a number of operational and economic hurdles in Puerto Rico that would act as an effective bar, even in wire centers with 40,000 business lines. First, the state and local bureaucratic processes necessary to obtain access to rights of way in Puerto Rico are extremely burdensome and time consuming. In fact, it took Centennial years just to get the municipal approvals necessary to construct its network. Second, some of the high-density wire centers are separated from other population centers by miles of rugged, undeveloped and mountainous terrain. It would simply not be cost effective to construct duplicative facilities the distances required to serve these wire centers.

For these reasons, WorldNet urges the Commission to use a combination of factors for identifying those wire centers where interoffice transport must be made available to competitors. One additional factor that surfaced during our conversation was whether a competitor had provisioned fiber-based collocation in a given wire center. WorldNet believes that it would be appropriate to use this as an additional factor for determining where transport alternatives actually exist.

Finally, WorldNet would like to remind the Commission that many parties have entered into commercial arrangements that touch on many of the issues presented in this proceeding. The Commission should remain mindful of this and use caution when drafting new rules to ensure that they do not expressly or impliedly supersede such commercial arrangements.

Respectfully submitted



Lawrence R. Freedman
Counsel for WorldNet Telecommunications, Inc.

Attachments

WIRE CENTER	Tariff Scale	Density Zone	Working NXX by Wire Center													
1 Bayamón North (I)	1	Urban	251	288	740	779	780	798	995							
2 Bayamón North (I)-(Toa Baja)	1	Urban	794													
3 Bayamón North (II)	1	Urban	269	778	785	786	787	959								
4 Caparra & Pueblo Viejo	1	Urban	273	277	706	707	749	774	775	781	782	783	792	793		
5 Isla Verde	1	Urban	253	791												
6 Río Piedras (I)	1	Urban	281	294	754	756	758	765	766	767	771	777				
7 Río Piedras (II)	1	Urban	250	274	282	296	751	753	759	763	764	772	773			
8 Santurce Este	1	Urban	268	726	727	728	982									
9 Santurce Oeste	1	Urban	289	721	722	723	724	725	729	977						
10 Bayamón South	1	Suburban	279	730	797	799										
11 Caguas	1	Suburban	258	286	703	704	743	744	745	746	747					
12 Carolina	1	Suburban	257	276	701	750	752	757	762	768	769	776				
13 Cataño	1	Suburban	275	788												
14 Guaynabo	1	Suburban	272	287	708	720	731	789	790							
15 Levittown	1	Suburban	261	784	795											
16 Mayaguez	1	Suburban	265	805	806	831	832	833	834	986						
17 Ponce (I)	1	Suburban	259	284	290	812	841	843	844							
18 Ponce (II)	1	Suburban	813	840	842	848	984									
19 Trujillo Alto	1	Suburban	283	292	293	748	755	760	761							
20 Aguada	2	Suburban	252	868												
21 Aguadilla	2	Suburban	882	891												
22 Aguadilla – Ramey	2	Suburban	819	890	997											
23 Arecibo	2	Suburban	815	816	817	878	879	880								
24 Arecibo – Santana	2	Suburban	881													
25 Arroyo – Patillas	2	Suburban	271	839												
26 Cabo Rojo	2	Suburban	254	255	851											
27 Camuy – Hatillo	2	Suburban	262	820	898											
28 Canóvanas	2	Suburban	256	876	886											
29 Cayey	2	Suburban	263	738												
30 Fajardo	2	Suburban	801	860	863											
31 Guayama	2	Suburban	864	866												
32 Humacao	2	Suburban	285	850	852											
33 Isabela	2	Suburban	830	872												
34 Juana Díaz	2	Suburban	260	837												
35 Lajas	2	Suburban	808	899												
36 Manatí	2	Suburban	854	884												
37 Río Grande	2	Suburban	809	887	888											
38 San Germán	2	Suburban	264	892												
39 San Lorenzo	2	Suburban	715	736												
40 San Sebastián	2	Suburban	280	896												
41 Vega Alta	2	Suburban	270	883												
42 Vega Baja	2	Suburban	807	855	858											
43 Yabucoa	2	Suburban	266	893												
44 Yauco	2	Suburban	267	856												
45 Adjuntas	3	SubSuburban	829													
46 Aguas Buenas	3	SubSuburban	732													
47 Aguirre	3	SubSuburban	853													
48 Aibonito	3	SubSuburban	735	991												
49 Añasco	3	SubSuburban	826													
50 Barceloneta	3	SubSuburban	846	970												
51 Barranquitas	3	SubSuburban	857													

52	Ceiba & Roosevelt Roads	3	SubSuburban	865	885														
53	Ciales	3	SubSuburban	871															
54	Cidra	3	SubSuburban	714	739														
55	Coamo	3	SubSuburban	803	825														
56	Comerio	3	SubSuburban	875															
57	Corozal	3	SubSuburban	802	859														
58	Dorado	3	SubSuburban	278	796														
59	Guánica - Ensenada	3	SubSuburban	821															
60	Guayanilla	3	SubSuburban	835															
61	Gurabo	3	SubSuburban	712	737														
62	Hormigueros	3	SubSuburban	849															
63	Juncos	3	SubSuburban	713	734														
64	Lares	3	SubSuburban	897															
65	Las Piedras	3	SubSuburban	716	733														
66	Luquillo	3	SubSuburban	889															
67	Moca	3	SubSuburban	818	877														
68	Morovis	3	SubSuburban	862															
69	Naguabo	3	SubSuburban	874															
70	Naranjito	3	SubSuburban	869															
71	Orocovis	3	SubSuburban	867															
72	Peñuelas	3	SubSuburban	836															
73	Quebradillas	3	SubSuburban	895															
74	Rincón	3	SubSuburban	823															
75	Sabana Grande	3	SubSuburban	804	873														
76	Salinas	3	SubSuburban	824															
77	Santa Isabel	3	SubSuburban	845															
78	Toa Alta	3	SubSuburban	870															
79	Utua	3	SubSuburban	814	894														
80	Villalba	3	SubSuburban	847															
81	Florida	4	Rural	822															
82	Jayuya	4	Rural	828															
83	Las Marías	4	Rural	827															
84	Maricao	4	Rural	838															
85	Maunabo	4	Rural	861															
86	Vieques	4	Rural	741															
87	Culebra	5	Rural	742															

BASIC SERVICES TARIFF SCHEDULE

INDIVIDUAL LINE SERVICE

**SECTION 1 - LOCAL EXCHANGE SERVICE AREAS
OF 40,001 MAIN STATIONS IN SERVICE AND OVER**

1.1 Applicability

- 1.1.1 Applies to automatic exchanges comprising the San Juan Metro Area, to individual line business, individual line residential service, and P(A)BX trunks. (T)
- 1.1.2 The San Juan Metro Area includes the following exchange areas: San Juan-Santurce, Río Piedras-Hato Rey-Trujillo Alto, Caparra, Cataño-Levittown, Bayamón, Guaynabo, Toa Baja, Isla Verde, and Carolina. (M)(T)
|
(M)(T)
- 1.1.3 Applies to any local exchange service area with over 40,000 main working stations in service. (M)
(M)

1.2 Territory

- 1.2.1 Within the Base Rate Area of each Exchange Area.

1.3 Rates

- 1.3.1 The charge for Basic Rent does not include the Standard Set.
- 1.3.2 Calls within an exchange will be metered as one message unit. Inter exchange calls within the calling zone will be metered as two message units. Message units in excess of the allowance will be charged at \$0.13. (T)
|
(T)

	Monthly Charge	
	Basic Rent, Per Line	Message Units Allowance
Business Main Station (Measured Rate)	\$ 23.05	85
Business Main Line (Measured Rate)	36.65	85
Residence Main Line (Measured Rate I)	9.25	70
Residence Main Line (Measured Rate II)	16.35	160
Residence Main Line (Flat Rate)	20.80	-
Residence Main Station (Measured Rate I)	7.25	70
Residence Main Station (Measured Rate II)	14.35	160
Residence Main Station (Flat Rate)	18.80	-
First Trunk Line (Measured Rate)	40.65	85
Additional Trunk Line (Measured Rate)	28.60	-
Group Hunting Features for Business, Residence and Trunk lines, per Group	10.00	

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